

**MEMO ENDORSED**

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THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
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 NEW YORK, NY 10007

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June 30, 2008

**BY FACSIMILE (212) 805-7927**

The Honorable Naomi Reice Buchwald  
 United States District Judge  
 Southern District of New York  
 500 Pearl Street  
 New York, NY 10007



Re: Paul Williams v. City of New York, et al., 08 Civ. 5498 (NRB)

Your Honor:

I am a Senior Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, representing defendant City of New York in the above-referenced matter. I write with respect to the above-referenced matter in which plaintiff alleges that his constitutional rights were violated by defendants. Defendant City respectfully requests an extension of time to answer or otherwise respond to this complaint from July 19, 2008 until September 19, 2008. Plaintiff has consented to this request for an extension of time.

There are several reasons for seeking an enlargement of time in this matter. In accordance with this office's obligations under Rule 11 of the Federal Rules of Civil Procedure, we need time to investigate the allegations of the complaint. Furthermore, it is our understanding that the records of the underlying criminal actions, including police records, may have been sealed pursuant to New York Criminal Procedure Law § 160.50. Therefore, this office is in the process of forwarding to plaintiff for execution authorizations for the release of sealed arrest records so that defendant can access the information, properly assess the case, and respond to this complaint.

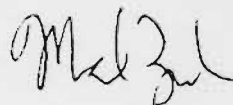
No previous request for an extension has been made by defendant City of New York. Accordingly, we respectfully request that defendant City of New York's time to answer or otherwise respond to the complaint be extended to September 19, 2008.

**MEMO ENDORSED**

So ordered:  
 Naomi Reice Buchwald  
 U.S.D.J.  
 7/3/08

Thank you for your consideration herein.

Respectfully submitted,



Mark D. Zuckerman  
Senior Counsel

cc: Mari Bonthuis, Esq. (Via Facsimile)